



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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EDP  
F. #2018R02250

271 Cadman Plaza East  
Brooklyn, New York 11201

February 25, 2023

By Hand Delivery and ECF

The Hon. Nicholas Garaufis  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Douglass Mackey  
Criminal Docket No. 21-80 (NGG)

Dear Judge Garaufis:

Enclosed please find a signed expert disclosure and documents demonstrating applicable credentials, provided in accordance with Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure and to supplement the government's February 15, 2023 submission (ECF Dkt. No. 62). The government reserves the right to supplement or correct this disclosure if appropriate. See Fed. R. Crim. P. 16(a)(1)(G)(vi). The government also requests reciprocal discovery from the defendant pursuant to Rule 16(b)(1)(C) of the Federal Rules of Criminal Procedure.

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/ Erik D. Paulsen  
Erik D. Paulsen  
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Enclosure

cc: Clerk of the Court (NGG) (by ECF)